



U.S. Department of Justice

United States Attorney
Eastern District of New York

F.# 2009R01111

271 Cadman Plaza East
Brooklyn, New York 11201

September 20, 2010

By FedEx

Michael A. Young, Esq.
165 Christopher Street, Suite 2D
New York, New York 10014

Re: United States v. Victor Dacosta Bourne
Criminal Docket No. 08-888(S-2) (NGG)

Dear Mr. Young:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government furnishes the following supplemental discovery with respect to the above-referenced case. The government also renews its request for reciprocal discovery.

Title Search Analysis of the following properties:
852-54 Linden Blvd, Brooklyn, NY
848 Linden Blvd, Brooklyn, NY
604 and 604A Flatbush Avenue, Brooklyn, NY
1022 Rutland Avenue, Brooklyn, NY
1024 Rutland Avenue, Brooklyn, NY
1026 Rutland Avenue, Brooklyn, NY

A compact disk and a hard copy of toll records for telephone number 718-877-9077. (Bates 000000001 - 000000276; 000000279 - 000000363; 000000364 - 000000397)

Toll records for telephone number 347-848-7017 indicating calls to the Line Control Office at JFK. (Bates 000000398 - 000000407).

Toll records for telephone number 718-813-4191. (Bates 000000408 - 000000444; 000000445 - 000000545).

Toll records for telephone number 876-381-3892. (Bates 000000546 - 000000562).

A compact disk containing Victor Bourne's MDC telephone calls from November 2009 through May 2009.

Documents seized from Maria Allyne on May 23, 2010.
(Bates 000000563 - 000000605).

Map of Barbados. (Bates 000000607 - 000000608).

Photographs of various locations in Barbados. (Bates
000000609 - 000000740).

Crew Chief Schedule for November 22, 2008 with attached
documents. (Bates 000000741 - 000000755).

A compact disk and a hard copy of a U.S. Passport in
the name of Victor Bourne. (Bates 000000756 - 000000766).

I.T.N. Consolidators, Inc. shipping documents. (Bates
000000767 - 000000775).

A confirmatory photograph of Victor Bourne that was
shown to several witnesses. (Bates 000000776).

A confirmatory photograph of Miquel Bozza that was
shown to several witnesses. (Bates 000000777).

Custody Receipts for cocaine and marijuana drug
seizures. (Bates 000000778 - 000000779).

DEA Lab Report and accompanying documents regarding
testing for December 18, 2006 marijuana seizure. (Bates 000000780
- 000000786).

CMA container Tracking document. (Bates 000000787).

Photographs of marijuana seizure. (Bates 000000788-
000000791).

NY DMV check of License Plate number DSG3650. (Bates
000000792- 000000794).

Jamaican Passport in the name of Phillip Hanson. (Bates
000000795 - 000000828).

A compact disk entitled "Bourne's payroll."

A compact disk entitled "Bourne PEN."

Barbados Travel Records for Victor Bourne, Phillip
Hanson, Trevor Jackson and Tracey Greene. (Bates 000000829 -
000000845).

Search Warrant and supporting affidavit for the red t-mobile cellular telephone and black cellular telephone in the possession of Victor Bourne on the date of his arrest. (Bates 000000846- 000000854).

Photograph of Sheldon Clarke, also known as "Dread." (Bates 000000855).

A Port Authority of New York and New Jersey Dossier Report for Victor Bourne. (Bates 000000856).

Toll records for telephone number 347-210-4894. (Bates 000000857-000000878).

Bureau of Immigrations and Customs Report of various telephones. (Bates 000000879)

Toll records for telephone number 917-868-3465. (Bates 000000880-000000934).

Toll records for telephone number 917-294-0552. (Bates 000000935 - 000000941).

American Airlines Rules and Code of Conduct.(Bates 000000942-000000943).

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____
Toni M. Mele
Assistant U.S. Attorney
(718)254-6138

cc: Clerk of the Court (NGG)